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16 Counsel for Robins Cloud LLP

17 UNITED STATES BANKRUPTCY COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 In re ) Case No. 19-30088 (DM)  
21 PG&E CORPORATION, )  
22 and ) Chapter 11  
23 )  
24 PACIFIC GAS AND ELECTRIC ) (Lead Case–Jointly Administered)  
25 COMPANY )  
26 Debtors )  
27 ) **REQUEST FOR RELIEF UPON**  
28 ) **DEFAULT IN SUPPORT OF MOTION**  
Affects: ) **FOR ORDER AUTHORIZING**  
 ) **WITHDRAWAL OF COUNSEL**  
 ☐ PG&E Corporation )  
 ☐ Pacific Gas & Electric Company )  
 ☒ Both Debtors ) [RE: Dkt. Nos. 10221, 10222, 10223, and 10224]  
 )  
 \* All papers shall be filed in the Lead )  
 Case, No. 19-30088 (DM). )  
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1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 Under B.L.R. 9014-1(b)(4), Robins Cloud LP (“Firm”) hereby requests that Court enter an  
3 order by default on its Motion for Order Authorizing Withdrawal of Counsel to Billy Dunn  
4 (“Creditor”)<sup>1</sup>, Dkt. No. 10221 (“Motion”).

5 **RELIEF REQUESTED IN THE MOTION**

6 The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the  
7 Creditor.

8 **NOTICE AND SERVICE**

9 A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of  
10 Counsel to Billy Dunn was filed concurrently with the Motion on February 18, 2021, Dkt. No. 10223  
11 (“Notice and Opportunity for Hearing”). The Motion, the supporting declaration of Robert Bryson,  
12 Dkt. No. 10222, and the Notice and Opportunity for Hearing were served as described in the  
13 Certificate of Service filed on February 18, 2021, Dkt. No. 10224.

14 The deadline to file a response or opposition to the Motion has passed, and no opposition has  
15 been filed with the Court or received by the Firm.

16 **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,  
18 that:

- 19 1. I am an individual over 18 years of age and competent to make this Declaration.  
20 2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly  
21 admitted to practice before all courts of the State of California and the United States District Court  
22 for the Northern District of California.  
23 3. I am counsel for the law firm of Robins Cloud LP (the “Firm”), attorneys of record  
24 for Billy Dunn (“Creditor”).<sup>2</sup>

25  
26 <sup>1</sup> Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other  
27 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client  
28 relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing  
Withdrawal of Counsel (“Bryson Decl.”), ¶2, fn.1.

<sup>2</sup> Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that no response or opposition has been filed with respect to the Motion.

5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-1(b)(3)(A).

WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed concurrently herewith granting the Motion for the reasons set forth therein.

Executed on April 29, 2021.

GRIMSHAW LAW GROUP, P.C.

/s/ Matthew W. Grimshaw

Matthew W. Grimshaw

Attorneys for Robins Cloud LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2021, I caused the forgoing **REQUEST FOR RELIEF  
UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING  
WITHDRAWAL OF COUNSEL** to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Billy Dunn.

I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party:

Billy Dunn  
14360 Skyway, Space B12,  
Magalia, CA 95954

/s/ Matthew W. Grimshaw  
MATTHEW W. GRIMSHAW